

Sendandi: Joh Vinding, Campaigns Director, Anima

Til nefndasviðs Alþingis

Dags. November 16th 2022

**Umsögn um frumvarp til laga um breytingu á lögum um dýravelferð, nr. 55/2013
(bann við blóðmerahaldi)**

53. mál, lagafrumvarp

153. löggjafarþing 2022–2023.

Frumvarpið er endurflutt, sjá [15. mál á 152. þingi - velferð dýra](#).

Ég mæli eindregið með samþykki þessa frumvarps um bann við blóðmerahald í heild sinni.

Greinargerð

While we are pleased that new legislation was introduced in August, signalling that Alþingis is aware of the serious animal welfare issues associated with PMSG production, the regulation is still a long way from addressing the fundamental issues, namely:

- Blood collection quantity and frequency (5 litres over 8 weeks, i.e. 40 litres in total) remain above international veterinary recommendations, putting a heavy physical strain on pregnant animals;
- Taking blood from semi-wild horses will always cause stress and fear and cannot be done without using force, therefore the regulation is missing a provision on mandatory taming and training of mares, in order to minimise distress.

Bloodfarms are completely unnecessary as there are synthetic alternatives to PMSG. Moreover, the use of PMSG is in itself highly problematic as it is related to a long list of welfare problems in industrial farming such as large litter sizes of pigs leading to higher piglet mortality.

Þar af leiðandi fer ég á leit við stjórnvöld að þau banni samstundis blóðtöku fylfullra hryssa, svokallaðra blóðmera, á Íslandi.

Virðingafyllst,

Joh Vinding, Campaigns Director, Anima

